

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

ALLIANCE FOR HIPPOCRATIC MEDICINE,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:22-cv-00223-z
)	
U.S. FOOD AND DRUG ADMINISTRATION,)	
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**MOTION OF JUDICIAL WATCH, INC. TO WAIVE THE
REQUIREMENT FOR LOCAL COUNSEL**

Pursuant to Fed. R. Civ. P. 7, movant, Judicial Watch, Inc. (“Judicial Watch”), hereby respectfully moves the Court to waive the requirements of Local Rule 83.10(a) to obtain local counsel who resides in or has as a principal office located within 50 miles of this courthouse.

In support of this motion, Judicial Watch would show that it is a non-partisan, public interest organization headquartered in Washington, D.C. which seeks to promote accountability, transparency and integrity in government, and fidelity to the rule of law. Judicial Watch seeks leave to file an *amicus curiae* brief in support of Plaintiffs’ Complaint and Motion for Temporary Injunction because it has been involved in obtaining information regarding the federal approval of drugs that intentionally end pregnancy that is crucial to this case. Additionally, Judicial Watch seeks leave to file an *amicus curiae* brief to address its concern over the degree of deference given federal executive agencies which has permitted them to morph into an unaccountable fourth branch of government.

Good cause exists to grant Judicial Watch’s request for a waiver from Local Rule 83.10(a)

as its participation, while important, is limited to the filing of an *amicus curiae* brief. Given this limited participation, local counsel would be unnecessary. However, should the Court require local counsel to participate in a hearing or other matter, JW will obtain local counsel.

For the foregoing reasons, Movant, Judicial Watch, Inc., respectfully requests that this Court enter an order waiving the local counsel requirement of Local Rule 83.10(a) for the purpose of filing an *amicus* brief.

Dated: February 10, 2023

Respectfully submitted,

/s/ Meredith Di Liberto

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CERTIFICATE OF CONFERENCE

I certify that on February 2, 2023, I contacted counsel for Defendants and Intervenor-Defendant by email concerning this motion to waive local counsel. On February 6, 2023, counsel confirmed that all parties agreed to the filing of *amicus curiae* briefs and that they took no position on the motion to waive local counsel. Plaintiffs' counsel has consented to all motions related to the filing of the *amicus curiae* brief.

/s/ Meredith Di Liberto

Meredith Di Liberto

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served, pursuant to the Federal Rules of Civil Procedure, on all counsel of record appearing herein via ECF on this 10th day of February, 2023 by the filing of this pleading with the Clerk of Court for the U.S. District Court for the Northern District of Texas using the Court's ECF system.

/s/ Meredith Di Liberto

Meredith Di Liberto